

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ZACKARY ELLIS SANDERS,

Defendant.

Case No. 1:20-cr-00143

The Honorable Judge Ellis

Hearing on Motion to Compel: May 28,  
2021

Trial: July 12, 2021

**CONSENT MOTION TO SEAL**

The defendant, Zackary Ellis Sanders, by counsel, moves this Honorable Court for entry of an Order permitting the defense to file under seal portions of Mr. Sanders's Reply to the Government's Opposition to his Motion to Compel ("Reply") and the entirety of exhibits 1 and 9. Mr. Sanders relies on the accompanying Memorandum as grounds for this motion.

Respectfully submitted,

ZACKARY ELLIS SANDERS  
By Counsel

Respectfully submitted,

/s/

Jonathan Jeffress (#42884)  
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/s/

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*Counsel for Defendant Zackary Ellis Sanders*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 19th day of May 2021, the foregoing was served electronically on counsel of record through the U.S. District Court for the Eastern District of Virginia Electronic Document Filing System (ECF) and the document is available on the ECF system.

/s/ Jonathan Jeffress  
Jonathan Jeffress